

Your response

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Question 1: What interest do you have in deploying outdoor or standard power Wi-Fi or other licence exempt RLANs in the Lower 6 GHz band? Please provide details of the types of expected deployments.	Viasat has no plans to deploy such services or facilities at this time.
Question 2: Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?	Viasat has no plans to provide or develop such AFC databases at this time in the UK.
Question 3: Do you have any views on the operational considerations of setting up and running AFC databases?	Viasat takes no position with respect to such matters at this time.
Question 4: Do you have any views on how we should manage the approval process for AFC databases and, in particular, whether we should rely on parts of the FCC process rather than requiring the whole process to be re-run in the UK?	Viasat takes no position with respect to such matters at this time.
Question 5: Please provide any other comments on our proposals for extending access to standard power Wi-Fi and outdoor use, including the overall approach, any details on technical parameters and the running of the AFC databases in this band.	Viasat takes no position with respect to such matters at this time.
Question 6: Do you have any comments on our proposal to use a “phased” approach, or on the alternative to wait for European harmonisation?	Viasat welcomes the opportunity to provide Ofcom with our views as to how to best enable the introduction of additional services in the upper 6 GHz band in the UK whilst preserving and protecting existing operations in the band. In short, the proposed introduction of new IMT/MFCN networks in this frequency band is a significant concern. For that reason, Viasat respectfully objects to Ofcom’s proposal to use a “phased” approach that would provide

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	a clear path for the introduction of such networks in the band. Viasat's satellite operations depend on the 6425-6575 MHz segment of the upper 6 GHz band for gateway up-links supporting its L-band Mobile Satellite Service (MSS) networks. These satellite networks, which operate the corresponding user-service downlink in the 1518-1559 MHz (space-to-Earth) band, provide critical safety-of-life communications and mission-essential services globally - across land, air, and sea. This includes support for emergency services, defense operations, and key industries such as transportation and energy. Concerns remain on the potential for interference into Viasat satellite receivers from IMT/MFCN systems if they are authorised in the upper 6 GHz band. ITU-R studies conducted during the WRC-23 cycle, based on parameters agreed by WP 5D, indicate a significant risk of harmful interference to Fixed Satellite Service (FSS) receivers. Earlier ITU-R studies, including Report ITU-R S.2367, similarly highlight that IMT operations can only co-exist with FSS if strict EIRP limits and limited deployment of IMT (i.e., to indoor operation) is ensured. In contrast, previous CEPT studies indicate low-power indoor Wi-Fi operations pose a much lower and acceptable interference risk to satellite receivers. Viasat has participated in previous Ofcom consultations on this topic and continues to hold concerns about the potential use of the upper 6 GHz band for IMT/MFCN networks. Viasat wishes highlight WRC-23 Resolution 220, which recognizes that the 6425-7075 MHz band is and will continue to be used by FSS networks, including for MSS feeder links. The proposed introduction of new IMT/MFCN networks in this frequency band is a significant concern. Any use of the band 6425-6575 MHz for mobile services should be contingent upon the establishment of technical safeguards that ensure the continued viability of feeder links. Implementing only the IMT mask per base station described in Resolution 220 (WRC-23) will not ensure adequate protection of satellite receivers operating in the band. This is because the emissions mask was defined based on an assumed base station density across the coverage of an FSS satellite. However, WRC-23 did not

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	adopt any measures to ensure that the global base station density is maintained below the assumed level. Given the assumed density is quite low, there is a significant risk that the aggregate interference to satellite receivers would be exceeded. Moreover, the “expected EIRP” limits adopted at WRC-23 to protect satellite uplinks are, in our view, very difficult – if not impossible – to enforce in practice. The definition of expected EIRP limits requires a complex assessment, requiring the base station to be tested for compliance with a particular configuration, including certain antenna pointing angles, and that the base station continue to operate in line with that configuration. It is unclear how Ofcom could verify that deployed base stations maintain such compliance over time. This concern is amplified by mobile industry proposals to operate with EIRP levels up to 10 dB higher than previous assumed. The current consultation does not adequately explain how Ofcom will ensure long-term compliance with the ITU limits. We therefore kindly request Ofcom to provide a more detailed strategy for enforcement before proceeding with any introduction of mobile services in the upper 6 GHz band, and in particular, in the frequency band 6425-6575 MHz. As a result, Viasat strongly encourages Ofcom to safeguard Fixed Satellite Service (FSS) operations, including Viasat’s MSS feeder links, by avoiding IMT/MFCN deployment below 6575 MHz. We therefore do not support a “phased” approach for the 6425-6575 MHz frequency band and propose that consideration of IMT/MFCN operation within the UK should be limited to spectrum above 6575 MHz. We also note that WRC-27 under Agenda Item 1.7 is considering additional allocations to the IMT within the frequency band 7125-7250 MHz and 7750-8400 MHz in Region 1. Identifying spectrum for mobile use limited to the frequency band 6575-7125 MHz would align with any outcome of WRC-27 on Agenda item 1.7.

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Question 7: Do you have any comments on the above suggestion to manage any “legacy” Wi-Fi devices, or alternative suggestions?	Viasat takes no position with respect to such matters at this time.
Question 8: Do you have a view on the amount of spectrum that should be prioritised for Wi-Fi under the prioritised spectrum split option? Please provide evidence for your view.	Ofcom’s proposes to authorize Wi-Fi operations in the upper 6 GHz band subject to the following technical conditions: • Outdoor Wi-Fi use would not be permitted, and • Indoor Wi-Fi use would be limited to 250mW EIRP (with maximum mean EIRP density of 12.6mW/MHz in any 1 MHz bandwidth). Under these assumptions, Wi-Fi could operate up to at least 6575 MHz whilst protecting Viasat’s feeder links.
Question 9: Do you have any comments on our plan for a “phase 1” when Wi-Fi will be introduced?	Regardless of how spectrum is prioritized as between Wi-Fi and mobile use, it is critical that Ofcom take steps to ensure that FSS operations are not adversely impacted. Toward that end, the range 6425-6575 MHz should be subject to the introduction of WI-FI indoor services only to ensure FSS services can operate interference free.
Question 10: One variation on “phase 1” would be to only authorise Wi-Fi in client devices to “seed” the market. Would you have any views on this, or suggestions for other variations?	Viasat takes no position with respect to such matters at this time.
Question 11: Do you have any comments on our plan for a “phase 2” when mobile will be introduced?	We do not think the range 6425-6575 MHz should be subject to the introduction of mobile as part of a second phase.
Question 12: Do you have a view on the amount of spectrum that should be prioritised for mobile under the prioritised spectrum split option? Please provide evidence for your view.	Ofcom is exploring multiple prioritized split options, as reflected in figure 5.1. Regardless of how spectrum is prioritized as between Wi-Fi and mobile use, it is critical that Ofcom take steps to ensure that FSS operations are not adversely impacted. Toward that end, mobile should not be authorized in the range 6425-6575 MHz (even in areas in which Wi-Fi has not yet been deployed) to ensure FSS services can operate interference free. Subject

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	to that limitation, Viasat believes that various prioritization options being contemplated can be accommodated.
Question 13: Do you have any evidence or views about the geographical extent of mobile networks' likely deployment in Upper 6 GHz?	Viasat takes no position with respect to such matters at this time.
Question 14: Do you have any comments on our proposed phased approach to authorisation of both Wi-Fi and mobile in the Upper 6 GHz band?	We do not think the range 6425-6575 MHz should be subject to the introduction of mobile as part of a second phase.
Question 15: Do you have any comments on our proposal to not include very low power portable devices in the Upper 6 GHz band at this stage, but to keep this under review?	Viasat takes no position with respect to such matters at this time.
Question 16: Do you have any comments on our proposal to authorise the use of low-power indoor Wi-Fi access points and client devices to use 6425–7125 MHz?	Ofcom's proposes to authorize Wi-Fi operations in the upper 6 GHz band subject to the following technical conditions: • Outdoor Wi-Fi use would not be permitted, and • Indoor Wi-Fi use would be limited to 250mW EIRP (with maximum mean EIRP density of 12.6mW/MHz in any 1 MHz bandwidth). Viasat supports Ofcom's proposed approach and agrees that indoor Wi-Fi systems should pose a limited interference risk to satellite receivers, as assessed within the SE 45 studies. This approach would therefore facilitate Wi-Fi while protecting Viasat's feeder links (including in the 6425-6575 MHz band segment). We note that other types of operations—including IMT/MFCN operations—would pose a much higher risk of interference into satellite operations. Accordingly, we do not support allowing IMT/MFCN operations in this frequency band.

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Question 17: Do you have any comments on the proposed technical conditions?	See our response to Question 16. Additionally, we note previous CEPT studies indicate low-power indoor Wi-Fi operations pose an acceptable interference risk to satellite receivers, and support only the identification of Wi-Fi in the 6425-6575/6585 MHz band.
Question 18: Do you have any comments on the proposed VNS draft?	Viasat takes no position with respect to such matters at this time.
Question 19: Do you have any suggestions for an appropriate mechanism for enhanced sensing, or comments on the proposed solution above?	Viasat takes no position with respect to such matters at this time.
Question 20: Do you agree with our proposal to restrict Wi-Fi from transmitting in the 6650-6675.2 MHz band to protect the radio astronomy service? Please provide any technical evidence to support your view.	Viasat takes no position with respect to such matters at this time.
Question 21: Do you agree with our assessment of Wi-Fi coexistence with existing users of the band? If not, please provide details.	See our response to Question 16
Question 22: Do you have any evidence about the costs to operators of moving fixed links in and around “high density” areas (such as urban centres) to other bands?	Viasat takes no position with respect to such matters at this time.
Question 23: Do you have any comments on our initial assessment of our likely approach to coexistence between future mobile use and current users in the Upper 6 GHz band?	See our response to Question 6
Question 24: Do you have any other comments on our policy proposals or	We note that CEPT is currently undertaking relevant activities, including: 1. Studies on the coexistence of Mobile and Fixed Communications Networks (MFCN) in the upper

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any of the issues raised in this document?	6 GHz band alongside existing uses. These include consideration on the current and future spectrum utilization for Wireless Access Systems/Radio Local Area Networks (WAS/RLAN) and MFCN. 2. A CEPT response to a Mandate from the European Commission on the potential shared use of the 6425-7125 MHz band. 3. Preparations for the World Radiocommunication Conference 2027 (WRC-27) on Agenda Item 1.7 on new International Mobile Telecommunications (IMT) bands in particular 7125-7250 MHz and 7750-8400 MHz in Region 1. We also note that the mobile industry is seeking higher EIRP for the operation of International Mobile Telecommunications (IMT) base-station equipment in the upper 6GHz band - up to 10 dB higher - than the values assumed in the ITU-R studies conducted leading to WRC-23. We would recommend waiting for the outcome of this work prior to considering IMT above 6575 MHz.